



Federal Regulatory Affairs

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March 12, 2012

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th St., S.W.
Washington, D.C. 20554

Re: *A National Broadband Plan for Our Future*, GN Docket No. 09-51; *Establishing Just and Reasonable Rates for Local Exchange Carriers*, WC Docket No. 07-135; *Developing a Unified Intercarrier Compensation Regime*, CC Docket No. 01-92; *Connect America Fund*, WC Docket No. 10-90; *High Cost Universal Service Support*, WC Docket No. 05-337; *Federal-State Joint Board on Universal Service*, CC Docket No. 96-45

Dear Ms. Dortch:

On March 8, 2012, Ken Mason, Vice President, Government and Regulatory Affairs, Frontier Communications (via telephone), and the undersigned met with Christine Kurth, Policy Directory & Wireline Counsel to Commissioner Robert McDowell.

The participants discussed the Petition for Clarification that Frontier filed with Windstream,¹ which requested the Commission to clarify that it did not intend to flash cut existing originating intrastate access rates for PSTN→VoIP access traffic to the interstate rate level.² Frontier explained that the effect of such an action could have significant revenue impacts on an ongoing basis as there is no originating access transition currently in place that would harmonize originating intrastate or interstate rates. Frontier made clear that its intrastate originating access revenues for PSTN→VoIP access traffic have never previously been in dispute so it is difficult to calculate the exact impact should that traffic now be billed at the interstate level.

Frontier also noted the potential for arbitrage that exists when interexchange carriers provide their own PVU, which is difficult to independently verify. Incorporating a PVU for originating intrastate traffic PSTN→VoIP access traffic also destabilizes a segment of billed traffic in which no instability previously existed because originating carriers could accurately detect whether the call was intrastate or interstate in nature.

¹ See Petition for Reconsideration and/or Clarification filed by Frontier Communications Corp. and Windstream Communications, Inc. ("*Petition*"), WC Docket 10-90, et al., at 21 (filed Dec. 29, 2011).

² Frontier also notes that the *Petition* takes no position on the effect of such a determination on the proper jurisdiction for calls that originate in IP and terminate on the PSTN.

Pursuant to Section 1.1206(b) of the Commission's rules, 47 C.F.R. §1.1206(b), this letter is being filed electronically with your office today.

Please feel free to contact me with any further questions.

Sincerely,

A handwritten signature in blue ink, reading "Michael Saperstein, Jr." with a stylized flourish at the end.

Michael D. Saperstein, Jr.
Director of Federal Regulatory Affairs
Frontier Communications
(202) 223-6807

cc: Christine Kurth